

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 17-cv-05806-RJB

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO
AGUIRRE-URBINA, individually
and on behalf of all those similarly
situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant

CIVIL ACTION NO. 17-cv-05769-
RJB

JOINT JUROR QUESTIONNAIRE

Plaintiff State of Washington (Washington), Plaintiffs Ugochukwu Goodluck Nwauzor and Fernando Aguirre-Urbina (the Private Plaintiffs), and Defendant The GEO Group, Inc. (GEO) respectfully submit the following Joint Proposed Juror Questionnaire.

Dated this 24th day of April, 2020.

Jointly submitted,

ROBERT W. FERGUSON
Attorney General of Washington

s/ Marsha Chien

MARSHA CHIEN, WSBA No. 47020
ANDREA BRENNEKE, WSBA No. 22027
LANE POLOZOLA, WSBA No. 50138
PATRICIO A. MARQUEZ, WSBA No. 47693
Assistant Attorneys General
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744
marsha.chien@atg.wa.gov
andrea.brenneke@atg.wa.gov
lane.polozola@atg.wa.gov
patricio.marquez@atg.wa.gov

Attorneys for Plaintiff State of Washington

AKERMAN LLP

s/ Adrienne Scheffey

COLIN L. BARNACLE
CHRISTOPHER J. EBY
ASHLEY E. CALHOUN
ADRIENNE SCHEFFEY
1900 Sixteenth Street, Suite 1700
Denver, CO 80202
Telephone: (303) 260-7712
Fax: (303) 260-7714
colin.barnacle@akerman.com
christopher.eby@akerman.com

s/ Jamal N. Whitehead

SCHROETER GOLDMARK &
BENDER
Adam J. Berger, WSBA #20714
Lindsay L. Halm, WSBA #37141
Jamal N. Whitehead, WSBA #39818
Rebecca J. Roe, WSBA #7560
810 Third Avenue, Suite 500
Seattle, WA 98104
Tel: (206) 622-8000
berger@sgb-law.com
halm@sgb-law.com
whitehead@sgb-law.com

THE LAW OFFICE OF
R. ANDREW FREE
R. Andrew Free (*Pro Hac Vice*)
P.O. Box 90568
Nashville, TN 37209
Tel: (844) 321-3221
andrew@immigrantcivilrights.com

OPEN SKY LAW, PLLC
Devin T. Theriot-Orr, WSBA # 33995
20415 – 72nd Avenue S, Suite 110
Kent, WA 98032
Tel: (206) 962-5052
devin@opensky.law

MENTER IMMIGRATION LAW,
PLLC
Meena Menter, WSBA # 31870
8201 – 164th Avenue NE, Suite 200
Redmond, WA 98052
Tel: (206) 419-7332
meena@meenamenter.com

Attorneys for Private Plaintiffs

1 ashley.calhoun@akerman.com
2 adrienne.scheffey@akerman.com

3 III BRANCHES LAW, PLLC

4 s/ Joan K. Mell

5 JOAN K. MELL, WSBA #21319
6 1019 Regents Boulevard, Suite 204
7 Fircrest, Washington 98466
8 Telephone: (253) 566-2510
9 Facsimile: (281) 664-4643
10 joan@3brancheslaw.com

11 *Attorneys for Defendant The GEO Group, Inc.*

JUROR QUESTIONNAIRE

PLEASE COMPLETE THE BLANKS ON THIS QUESTIONNAIRE. THIS INFORMATION WILL SHORTEN THE JURY SELECTION PROCESS AT TIME OF TRIAL.

Name: _____

City or area of residence: _____

Length of time residing in Washington: _____

If less than three (3) years, where did you last reside: _____

Age: _____ Marital Status: _____

Occupation & Job Title: _____
(If retired, please give previous occupation)

Employer: _____

Number and ages of children: _____

Occupations of members of household: _____

Number of years you completed in school: _____

Degrees/certifications/licenses received: _____

Have you ever served as a juror? _____

If so, please state:

year(s) (If not certain give approximate year(s): _____

court(s): _____

type of case(s): _____

I CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY INFORMATION AND BELIEF.

DATE: _____ SIGNATURE: _____

Number: (Not your participant number. Leave blank until assigned a juror badge or card) _____

ADDITIONAL JUROR QUESTIONNAIRE

Have you or a close family member ever been imprisoned, civilly detained, or detained while pending trial? _____ If yes, what was the facility? _____

Have you or a close family member or friend ever been involved in a lawsuit? Yes / No (circle one). If yes, please describe: _____

As an employer or employee, have you or a close family member or friend ever been in a dispute with an employer or employee? ☐ Yes ☐ No. If yes, please describe: _____

Do you have an opinion about whether immigration detention facilities should be operated by private companies? Please explain your answer: _____

Do you know anyone who has been in detention, been deported or could be detained/deported based on a challenge to his or her legal status? ☐ Yes ☐ No

Do you know anyone who has been through the U.S. citizenship process or has become a naturalized citizen? ☐ Yes ☐ No

Do you think too many immigrants come to the United States?

☐ Agree

☐ Disagree

☐ Other

Please explain: _____

Is your opinion about immigrants

☐ Generally positive

☐ Generally negative

☐ Generally neutral

Please explain: _____

Do you think minimum wage laws hurt employers?

Please explain: _____

Where do you get your news? (Please check all that apply)

☐ Newspaper

☐ Television

☐ Radio

☐ Internet

☐ Magazines

☐ Other: _____

What news source(s) or outlets (e.g., Fox, CNN, etc.) do you consult regularly? _____

Have you ever served in the military? If so, which branch and for how long? _____

Do you think jurors should follow the law as it is written, recognizing that even “bad” laws must be changed through legislation? ☐ Agree ☐ Disagree

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Devin T. Theriot-Orr
OPEN SKY LAW, PLLC
20415 – 72nd Avenue South, Suite 110
Kent, WA 98032
devin@opensky.law
Attorney for Plaintiff

R. Andrew Free
THE LAW OFFICE OF R. ANDREW FREE
PO Box 90568
Nashville, TN 37209
andrew@immigrantcivilrights.com
Attorney for Plaintiff

Meena Menter
MENTER IMMIGRATION LAW PLLC
8201 – 164th Avenue NE, Suite 200
Redmond, WA 98052
meena@meenamenter.com
Attorney for Plaintiff

Joan K. Mell
III BRANCHES LAW, PLLC
1019 Regents Boulevard, Suite 204
Fircrest, WA 98466
joan@3brancheslaw.com
Attorney for Defendant

Colin L. Barnacle
Ashley E. Calhoun
Christopher J. Eby
Adrienne Scheffey
AKERMAN LLP
1900 Sixteenth Street, Suite 1700
Denver, CO 80202
colin.barnacle@akerman.com
ashley.calhoun@akerman.com
christopher.eby@akerman.com
adrienne.scheffey@akerman.com
Attorneys for Defendant

Dated this 24th day of April 2020, in Seattle, Washington.

s/ Virginia Mendoza
Virginia Mendoza, Legal Assistant